

REMARKS

The present Amendment amends claims 1 and 14 and leaves 2-4, 6-13 and 15-21 unchanged. Therefore, the present application has pending claims 1-4 and 6-21.

Applicant's Attorney, the undersigned, respectfully request that the Examiner contact Applicants' Attorney by telephone so as to discuss the outstanding issues of the present application prior to examination. Such an interview is urgently requested and is necessary in this situation since it appear that the Examiner may have misunderstood the references of record.

Claims 1-4 and 6-21 stand rejected under 35 USC §103(a) as being unpatentable over Strasnick (U.S. Patent No. 5,528,735) in view of Kothuri (U.S. Patent No. 6,381,605). This rejection is traversed for the following reasons. Applicants submit that the features of the present invention as now more clearly recited in claims 1-4 and 6-21 are not taught or suggested by Strasnick or Kothuri whether taken individually or in combination with each other as suggested by the Examiner. Therefore, Applicants respectfully request the Examiner to reconsider and withdraw this rejection.

Amendments were made to claims 1-4 and 6-21 in order to more clearly describe features of the present invention not taught or suggested by any of the references of record particularly Strasnick and Kothuri whether taken individually or in combination with each other as suggested by the Examiner.

The present invention is directed to a spatial data relationship displaying method and system in which server definition data representing an outline of a server is acquired along with application definition data representing an outline of an application and server object property structure data which corresponds to the server is acquired along with application object property structure data which corresponds to the application. A relationship is generated between an object of a first image as defined by the server and an object of a second image as defined by the application based on the acquired server definition data, application definition data, object property structure data and thesaurus data.

According to the present invention as illustrated, for example, in Fig. 2 object hierarchical structure data of the server and object hierarchical structure data of the application are displayed on a display screen 1001 with the generated relationship graphically indicating the relationship between the object of the first image as defined by the server and the object of the second image as defined by the application on the display screen 1001. In addition, the object property structure data of an object pointed to by an indication means is displayed on the display screen and the relationships between the objects can be modified or decided based on a confirmation operation input from the indication means.

Thus, unique according to the present invention is that as illustrated in Fig. 10 the "indicator of relationships among objects of the first and second images" is generated and displayed on the display screen 1001 so as to indicate relations between the objects of the second image as defined by the application displayed in a hierarchical structure as the "indicator of application object hierarchical structure"

and the objects of the first image as defined by the server illustrated as the "indicator of server object hierarchical structure". These features of the present invention as recited in the claims are described, for example, on page 6, line 26 through page 7, line 28 and on page 3, lines 16-22 of the present application.

The above described features of the present invention are not taught or suggested by any of the references of record whether taken individually or in combination with each other. Particularly, the above described features of the present invention are not taught or suggested by Strasnick or Kothuri whether taken individually or in combination with each other as suggested by the Examiner.

Numerous differences were shown between the features of the present invention as recited in the claims and Strasnick in the Remarks of the July 1, 2004 Amendment, and the Remarks of the May 16, 2005 Amendment, said Remarks being incorporated herein by reference. As argued in the Remarks of the July 1, 2004 and May 16, 2005 Amendments, Strasnick merely discloses the displaying of objects such as a shape of a bar in a three-dimensional graphic landscape. Attention is directed to Figs. 1 and 2 of Strasnick. Thus, Strasnick simply teaches a method and apparatus for navigation with a three-dimensional information landscape such that a set of data attributes are defined and a mapping of the set of data attributes into objects displayed within a three-dimensional landscape is performed in accordance with a simulation language.

However, at no point is there any teaching or suggestion in Strasnick of the above described features of the present invention as recited in the claim which is intended to allow for a first database of spatial data having a first set of definition

instructions to be used by an application which normally performs functions using a second database having a second set of definition instructions different from that of first set of definitions of the first database and structure. The present invention as recited in the claims accomplishes such by acquiring server definition data representing an outline of a server and application definition data representing an outline of an application. Such features are clearly not taught or suggested by Strasnick.

Further, the present invention as recited in the claims acquires server object property structure data which corresponds to the server and application object property structure data which corresponds to the application. The acquiring of object property structure data as in the present invention are clearly not taught or suggested by Strasnick.

Still further, the present invention as recited in the claims generate a relationship between an object of the first image as defined by the server and an object of the second image as defined by the application based on the acquired server definition data, application definition data, object property structure data and thesaurus data.

Thus, as is clearly illustrated in, for example, Fig. 10 of the present application an object of a first image as defined by the application such as, for example, the "facility" and an object of a second image as defined by the server such as, for example, the "waterpipe" are actual objects forming a part of two different images as recited in the claims. There is absolutely no teaching or suggestion in Strasnick of using objects in two different images as in the present invention and causing a

relationship to be generated between the two objects of the two different images as in the present invention.

It should be noted that the object of the present invention is that data managed by a server is processed such that if an object of an image in an application A and an object of an image in a server application B are differently defined but have the same meaning in the real world, then the present invention generates a relationship between the objects in the application A and B so that either of the applications A and B can be used.

Strasnick teaches, for example, in col. 20, lines 25-30 that a corporate database server 800 obtains data for a sales application and loads the data into a graphical query tool 810. Strasnick then teaches that by use of the graphical query tool required data components can be retrieved from the database and loaded into specified columns in the spreadsheet application worksheet 820 which is then used to generate the 3D representation of histograms identifying the sale of various components.

In the Office Action the Examiner alleges that this teaching of Strasnick discloses the generation a relationship between objects as in the present invention. However, such is not the case being that the present invention is directed to generating relationships between objects in two separate images. The teachings of Strasnick as per the above merely maps the sales data onto a histogram type platform so as to illustrate by various bar-graphs the amount of sales of various components in a 3D display. Thus, there is no teaching whatsoever in Strasnick that the relationships being generated is intended to relate an object in a first image as

defined by an application and an object in a second image as defined by a server as in the present invention.

Further, the Examiner did not in anyway address the use of the thesaurus data for the generation of the indicated relationships as in the present invention. The claims of the present application specifically recite that the relationship between an object of a first image as defined by the server and an object of the second image as defined by the application is based on thesaurus data along with server definition data, application definition data and object property structure data. At no point has the Examiner identified where such thesaurus data can be found in Strasnick or is used in the manner as recited in the claims.

Even beyond the above, there is no teaching or suggestion in Strasnick that object hierarchical structure data of the server and object hierarchical structure data of the application are displayed with the generated relationship, thereby graphically indicating the relationship between the objects of the server and the objects of the application. Such features are clearly not taught or suggested by Strasnick.

Thus, Strasnick fails to teach or suggest acquiring server definition data representing an outline of a server and acquiring definition data representing an outline of an application as recited in the claims.

Further, Strasnick fails to teach or suggest acquiring server object property structure data which corresponds to the server and application object property structure data which corresponds to the application and generating a relationship between an object of the first image as defined by the server and an object of the second image as defined by the application based on the server definition data, the

application definition data, the object property structure data and the thesaurus data
as recited in the claims.

Still further, Strasnick fails to teach or suggest displaying object hierarchical structure data of the server and object hierarchical structure of the application, with the generated relationship and graphically indicating the relationship between the object of the first image as defined by the server and the object of the second image as defined by the application on a display as recited in the claims.

Even further yet, Strasnick fails to teach or suggest displaying the object property structure data of an object pointed to by indication means on the display and modifying and deciding the relationship between the objects based on a confirmation operation input from the indication means as recited in the claims.

Therefore, as is clear from the above the features of the present invention as recited in the claims are not taught or suggested by Strasnick whether taken individually or in combination with any of the other references of record.

The above noted deficiencies of Strasnick are not supplied by any of the other references of record. Particularly, the above described features of the present invention as recited in the claims shown above not to be taught or suggested by Strasnick are also not taught or suggested by Kothuri. Therefore, combining the teachings of Strasnick and Kothuri in the manner suggested by the Examiner in the Office Action still fails to teach or suggest the features of the present invention as now more clearly recited in the claims.

Kothuri is merely relied upon for an alleged teachings of displaying object hierarchical structure data of the server and object hierarchical structure data of the

application with the generated relationship and acquiring server object property structure data which corresponds to the server and application object property structure data which corresponding to the application. However, Applicants fail to find any such teaching in Kothuri. It appears that the Examiner may have completely mis-described the teachings of Kothuri.

Kothuri merely discloses a system and method for indexing and storing multi-dimensional or multi-attribute data. However, this teaching of Kothuri is not in anyway related to server object property structure data and application object property structure data which are used to describe a structure of two different objects in two different images which are to be related to each other to permit the use of a common application program as in the present invention as recited in the claims. There is no such attempt in Kothuri to relate two different objects of two different images to each other as in the present invention. Kothuri merely provides a multi-dimensional or multi-attribute database for use in providing a searchable more tolerable database. There is absolutely no teaching or suggestion in Kothuri of the above described features of the present invention shown above not to be taught or suggested by Strasnick.

Thus, Kothuri fails to teach or suggest acquiring server definition data representing an outline of a server and acquiring definition data representing an outline of an application as recited in the claims.

Further, Kothuri fails to teach or suggest acquiring server object property structure data which corresponds to the server and application object property structure data which corresponds to the application and generating a relationship

between an object of the first image as defined by the server and an object of the second image as defined by the application based on the server definition data, the application definition data, the object property structure data and the thesaurus data as recited in the claims.

Still further, Kothuri fails to teach or suggest displaying object hierarchical structure data of the server and object hierarchical structure of the application, with the generated relationship and graphically indicating the relationship between the object of the first image as defined by the server and the object of the second image as defined by the application on a display as recited in the claims.

Even further yet, Kothuri fails to teach or suggest displaying the object property structure data of an object pointed to by indication means on the display and modifying and deciding the relationship between the objects based on a confirmation operation input from the indication means as recited in the claims.

As is clear from the above Kothuri suffers from the same deficiencies relative to the features of the present invention as recited in the claims as Strasnick. Therefore, combining the teachings of Strasnick and Kothuri in the manner suggested by the Examiner in the Office Action still fails to teach or suggest the features of the present invention as now more clearly recited in the claims. Accordingly, reconsideration and withdrawal of the 35 USC §103(a) rejection of claims 1-4 and 6-21 as being unpatentable over Strasnick in view of Kothuri is respectfully requested.

The remaining references of record have been studied. Applicants submit that they do not supply any of the deficiencies noted above with respect to the references utilized in the rejection of claims 1-4 and 6-21.

In view of the foregoing amendments and remarks, applicants submit that claims 1-4 and 6-21 are in condition for allowance. Accordingly, early allowance of claims 1-4 and 6-21 is respectfully requested.

To the extent necessary, the applicants petition for an extension of time under 37 CFR 1.136. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, or credit any overpayment of fees, to the deposit account of MATTINGLY, STANGER, MALUR & BRUNDIDGE, P.C., Deposit Account No. 50-1417 (500.38695X00).

Respectfully submitted,

MATTINGLY, STANGER, MALUR & BRUNDIDGE, P.C.

 37,846

Carl I. Brundidge
Registration No. 29,621

CIB/jdc
(703) 684-1120